

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BABY DOE, *et al.*,

Plaintiffs-Counterclaim Defendants,

-v.-

JOSHUA MAST, *et al.*,

Defendants-Counterclaim Plaintiffs,

CIVIL NO: 3:22-cv-00049-RSB-JCH

**SECOND CONSENT MOTION FOR EXTENSION AND TO SET AN AMENDED
BRIEFING SCHEDULE FOR RESPONSE/REPLY TO MOTION TO DISMISS
RICHARD MAST'S COUNTERCLAIMS**

Defendant-Counterclaim Plaintiff Richard Mast, with the gracious consent of Plaintiffs-Counterclaim Defendants John and Jane Doe, respectfully ask that the Court extend the time for Richard Mast to respond to John and Jane Doe's motion to dismiss the counterclaims one week from October 21, 2024 (as set by this Court's Oral Order, dated October 11, 2024 [Dkt. No. 504]) to October 31, 2024, and commensurately reset the Does' reply deadline to November 18, 2024.

This motion, as was the previous consent motion seeking a one-week extension, is based upon exigent personal circumstances overseas for the undersigned requiring his immediate attention, with this instance requiring time until the end of the Jewish holy days of Succos, which conclude October 25, plus time for return travel.

WHEREFORE, Defendant-Counterclaim Plaintiff Richard Mast respectfully asks the Court to extend the time for his response to Plaintiffs-Counterclaim Defendants' motion to dismiss the counterclaims to October 31, 2024, and Counterclaim Defendants' reply to November 18, 2024. A proposed Order is attached.

//

Dated: October 15, 2024

Respectfully submitted,

/s/David Yerushalmi

David Yerushalmi, Esq.*

American Freedom Law Center

2020 Pennsylvania Avenue NW, Suite 189

Washington, D.C. 20006

(*Admitted *pro hac vice*)

E. Scott Lloyd

Lloyd Law Group, PLLC

Va. Bar # 76989

20 E. 8th Street, Suite 3

Front Royal, VA 22630

Office: (540) 823-1110

Cell: (540) 631-4081

Fax: (540) 583-4279

scott@lloydlg.com

Counsel for Defendant Richard Mast

CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2024, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties for whom counsel has entered an appearance by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. I further certify that a copy of the foregoing has been served by ordinary U.S. mail upon all parties for whom counsel has not yet entered an appearance electronically: none.

/s/David Yerushalmi
David Yerushalmi, Esq.